F: Hoechst North America, Inc

ATOCHEM
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ATOCHEM NORTH AMERICA, INC.
17168 West Jefferson Avenue
Riverview, Michigan 48192-4270

Tel: (313) 285-9200

March 21, 1991

Mr. Roy E. Schrameck, Supervisor
Compliance Section
Surface Water Quality Division
Michigan Department of Natural Resources
38980 Seven Mile Road
Livonia, Michigan 48152

Reference: NPDES Permit No. MI 0002381
Atochem North America, Inc.

Dear Mr. Schrameck:

Enclosed is a copy of a notification that was submitted to Mr. Bill Shaw of the Permits Section on March 14, 1991. It concerns the conversion of our Process 12 from the production of amyl phenols to the production of Methane Sulfonamide (MSAM). I had telephoned Ms. Hae-Jin Yoon to discuss this with her on March 8, 1991.

If you have any questions regarding the attached notification, please contact me at (313) 246-2030.

Very truly yours,

ATOCHEM NORTH AMERICA, INC.

Thomas M. Ray, Manager
Environmental Affairs

TMR:lmm

Enc.

cc: Ms. Hae-Jin Yoon
Surface Water Quality Division
Michigan Department of Natural Resources
38980 Seven Mile Rd.
Livonia, Michigan 48152

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March 14, 1991

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. William Shaw
Permits Section
Surface Water Quality Division
Michigan Department of Natural Resources
P. O. Box 30028
Lansing, Michigan 48909

Reference: NPDES Permit No. MI 0002381
Atochem North America, Inc.

Dear Mr. Shaw:

In compliance with Part II A.2. of referenced permit this letter is to inform you that Atochem North America - Riverview Plant has ceased the production of amyl phenols at Process 12 and that the process is being converted to manufacture Methane Sulfonamide (MSAM) via a batch process, along with co-product ammonium chloride.

The process to produce MSAM uses two raw materials, reacting in a solvent medium. A process flow diagram, Dwg. WW12-8579, is attached for reference. The process yield is in excess of 99%. The materials charged to the reactor are:

Reactant	- Methane Sulfonyl Chloride (MSC)	5,030 lbs.
Reactant	- Anhyd. Liquid Ammonia (NH3)	1,545 lbs.
Solvent	- Tetrahydrofuran (THF)	15,155 lbs.
		21,730 lbs.

Process contact waste water losses (scrubber effluent and vacuum jet discharge) are expected to be limited to 75 lbs. of NH3 and 40 lbs. of THF in 750 gallons of water per day. Approximately 300 gallons per minute of noncontact cooling water will also be discharged.

A four to six week pilot campaign is scheduled to begin on April 8, 1991. During this pilot campaign, the contact water will be collected for evaluation and treatment, or for shipment off-site to a licensed treatment facility. There will be no exceedance of the effluent limitations specified in referenced permit from this process. Note that the process will operate around the clock, seven days per week during the pilot campaign.

Please note that we will make another notification following the pilot champaign and prior to any additional production, which will include actual flow rate and characterization of waste water as well as the treatment method we plan to utilize.

In the meantime if there are any questions regarding the MSAM process please contact me at (313) 246-2030.

Very truly yours,

ATOCHEM NORTH AMERICA, INC.

Thomas M. Ray, Manager
Environmental Affairs

TMR:lmm

Enclosure